IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS (Jointly Administered)

INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE HEARD AT THE SEPTEMBER 16-17, 2020 OMNIBUS HEARING

The Ad Hoc Group of PREPA Bondholders (collectively, the "Ad Hoc Group") submit this informative motion in response to the Court's *Order Regarding Procedures for September 16-17, 2020 Omnibus Hearing* (the "Order") setting forth guidelines for parties wishing to be heard at the September 16-17, 2020 omnibus hearing (the "Hearing").

1. The Order requests that counsel who intend to speak at the Hearing file an informative motion identifying (a) the relevant motion or report, (b) the parties who intend to appear and speak in connection with the relevant motion or report, (c) the names of no more than two individuals who intend to speak on behalf of each party in connection with the relevant motion

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

or report, (d) the order in which the parties to the relevant motion shall present argument, and (e) time allocations for each speaker.

- 2. Alice J. Byowitz of Kramer Levin Naftalis & Frankel LLP will appear on behalf of the Ad Hoc Group at the Hearing.
- 3. Ms. Byowitz does not intend to speak on behalf of the Ad Hoc Group but reserves the right to be heard on any matter raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of the Ad Hoc Group.

[Remainder of Page Intentionally Left Blank]

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today September 11, 2020.

TORO COLÓN MULLET P.S.C.

P.O. Box 195383 San Juan, PR 00919-5383 Tel.: (787) 751-8999

Fax: (787) 763-7760

/s/ Manuel Fernández-Bared

MANUEL FERNÁNDEZ-BARED USDC-PR No. 204,204 E-mail: mfb@tcm.law

/s/ Linette Figueroa-Torres

LINETTE FIGUEROA-TORRES USDC-PR No. 227,104 E-mail: lft@tcm.law

/s/ Nayda Perez-Roman

NAYDA PEREZ-ROMAN USDC-PR No. 300,208 E-mail: nperez@tcm.law

Counsel for the Ad Hoc Group of PREPA Bondholders

KRAMER LEVIN NAFTALIS & FRANKEL LLP

1177 Avenue of the Americas New York, New York 10036 Tel.: (212) 715-9100

Fax: (212) 715-8000

/s/ Alice J. Byowitz

AMY CATON*
THOMAS MOERS MAYER*
ALICE J. BYOWITZ*
DOUGLAS BUCKLEY*

Email: acaton@kramerlevin.com tmayer@kramerlevin.com abyowitz@kramerlevin.com dbuckley@kramerlevin.com *Admitted Pro Hac Vice

Counsel for the Ad Hoc Group of PREPA Bondholders